



Missouri Department of Higher Education and Workforce Development

FREQUENTLY ASKED QUESTIONS (FAQs) ABOUT...

OWD Issuance 05-2020: WIOA Youth Program Eligibility and Documentation Technical Assistance Guidance

(Issued: August 28, 2020)

Last update: December 27, 2021.

Q: Do we have to validate employment status at participation?

A: No. After reviewing [TEGL 23-19, Attachment 2](#), employment status at participation is only reported to DOL but does not require data element validation to occur. Staff must document the answer to this question, but collecting source documentation is no longer required. This question will be removed from state monitoring workbooks moving forward.

Last update: December 2021.

Q: Does a signed WIOA Application meet the requirements for a WIOA Self-Attestation?

A: Yes. After internal review and discussion, we have reversed our decision on this matter and will accept a signed WP or WIOA Application to serve as self-attestation documentation for all elements allowed to use the attestation as a source document. If the WP or WIOA Application is used, a separate WIOA Self-Attestation is not necessary. Please refer to the table in the latest TAG and/or [TEGL 23-19, Attachment 2](#), for specific source documentation requirements.

Q: Can the Applicant Statement be used in place of the Self-Attestation?

A: No. The Applicant Statement is to be used as a last resort for very specific instances when **ALL** attempts to obtain other allowable verification documents have been exhausted and those attempts documented in case notes.

The three (3) instances when an Applicant Statement is allowable for verification:

- **Family Size:** only when other documents cannot be obtained;
- **Individual Status:** when an individual ordinarily included in the definition of a family claims to not be a dependent of that family. Proof of sources of support must be provided by the individual and the Applicant Statement must be witnessed and signed by the head of household of the individual's residence;
- **Proof of Income:** only for individuals claiming no income or undocumented income. Sources of support must be included in the Applicant Statement.

Q: How are SSNs verified for Dislocated Worker Grant participants?

A: Missouri has chosen to verify SSNs across all programs and has developed an extensive list of allowable source documentation. However, per TEGL 23-19, all Dislocated Worker Grant participants must have their SSN verified using specific documentation listed in TEGL 23-19, Attachment 2. Allowable documents to validate a SSN is limited to:

- SSN Card
- Passport
- Military ID
- Other Federal or State ID with SSN

Staff cannot use the list of Missouri accepted documents for participants enrolled in a DWG. This rule went into effect October 2, 2020 and affects all enrollments performed after. The source documentation table was updated to reflect these details

Q: What update was made to the Self-Attestation Form?

A: The "Self-Attestation" form was updated to remove the following statement: "If applicant cannot obtain a satisfactory witness or provide a telephone contact, explain above." The Self-Attestation form does not require a witness signature, so this reference was removed.

Q: Should the 406, Tutoring, Study Skills, and Dropout Prevention, service be posted for ALL In-School WIOA Youth?

A: No. We have received clarification from DOL that this program element service should only be provided to youth who need the identified services. Services should be based on the needs identified in the ISS.

Q: What were the most recent updates to the T.A.G.?

A: The income section was updated to clarify that participants must complete the self-attestation form to report income when their eligibility is not income-contingent. All changes are in red text.

Q: According to the T.A.G., the WIOA intake form can be used as verification for Employment Status at enrollment. MoJobs does not list the intake form as a way to verify this. Should staff select other and type signed intake form?

A: Yes. If using the signed intake form, for this element, please select OTHER and note the WIOA intake form is being used. We have limitations as to what we can

have published as a “verify” option in MoJobs, so if the acceptable source documentation is not listed has an option, always use ‘Other’ with the indication of what document is being used.

Update: November 2020.

Q: In the WIOA application, do staff have to enter “family size” and “income” for WIOA Youth whose barrier does not require income documentation? If yes, what documentation is required?

A: Yes. Low-income is a PIRL reporting requirement. TEGL 23-19 requires that low income be reported at program entry for all WIOA programs.

If income is not an eligibility requirement (i.e. Out-of-School drop-out, pregnant/parenting, etc.), self-attestation is acceptable for family size and income. In those instances, staff DO NOT need documentation such as pay stubs.

For additional information please see the full TEGL, please click [HERE](#).

Q: If the “household and income” tab states “Low income has already been established based upon previous entries. Family size and income are optional,” do staff still need to answer the family size and income questions?

A: No. That message will display in MoJobs when a low-income indicator has been activated such as marking a participant as receiving public assistance. When that message is displayed, staff do not need to add family size and income, because low-income has already been reported to the PIRL.

Updated October 2020

Q: The T.A.G. lists more acceptable sources of documentation than what is listed in TEGL 23-19 when verifying the Social Security Number (SSN), why is that?

A: The TEGL only requires the SSN number to be validated for the Dislocated Worker Grant (DWG) program and other partner programs. However, in Missouri, since we use wage matching with UI to report on some performance measures, we require the SSN to be validated.

The TEGL says that states can require other data to be validated:

DOL recommends that grant recipients identify similar data elements that are required for validation, such as for eligibility documentation, and use those requirements as a basis for developing source documentation requirements for any additional elements beyond the requirements set forth in Attachment II.

The T.A.G. states "Missouri requirement" on the SSN box, and OWD chose to list other options that would verify this information.

Please note that any new DWG enrollments will have to follow the TEGL requirements, and those will be outlined in DWG corresponding materials which are being updated.

Q: Can staff use selective service registration since the proof of registration document does not display the full Social Security Number (SSN)?

A: Yes. Case managers must type in the full SSN to find the registration to match to, therefore it is acceptable.

Updated September 2020

Q: What are the allowable documents to prove "employment status at participation"?

A: The T.A.G was updated to include the source documentation requirements for this data element.

Updated August 28, 2020

Q: If an individual's DD-214 character of service states "other than honorable conditions", can they be enrolled with full Veteran status and priority of service?

A: Yes. It is appropriate to provide services to separating service members who will be imminently separating from the military, provided that their discharge will be anything other than dishonorable.

Q: Are Boards and Subrecipients required to maintain hard-copy paper files for participant information?

A: No with one exception. As the organization moves towards a paperless approach, OWD is strongly encouraging Boards/Subs to utilize the upload feature in MoJobs. Once staff verify the upload was successful, there is no reason to keep hard-copy documentation and staff may return the documentation to the participant or properly dispose of it. The one exception is when the participant has a confidential or Equal Opportunity issue; all confidential information should be kept in separate and secure hard file.

Q How are family size and income fields supposed to be completed when the information is not necessary to determine eligibility?

A: Family size and income fields must be completed, even if the information is not required for eligibility determination. Information entered must be true and as accurate as possible. Additionally, this documentation is not required to be maintained in the hard file. These fields are reported on the Participant Individual Record Layout (PIRL) reports to the US Department of Labor. Staff cannot continue to report individuals as being low-income, (using 1/\$0) when the participant is, in fact, not low-income.

Q: For "Citizenship/Eligible to Work in the US", do staff need to actually complete I-9 forms?

A: No, staff only need to obtain copies of the supporting documents that would be used in the I-9 verification process. Staff do not need complete an I-9 form when verifying documentation for eligibility purposes.

Q: If a Youth is receiving SNAP, TANF, or living in a high poverty area, do staff need to collect income and family size documentation?

A: No, those are examples of automatic low-income documentation. If a Youth provides any acceptable automatic low-income documentation, then other income/family size documentation is not required.

Q: Can a participant be dually enrolled into WIOA Youth and WIOA Dislocated Worker?

A: Yes, it is possible. Staff would need to document both eligibilities and staff would need to make sure they select the correct funding stream when posting services.

Q: Who is considered a dependent when figuring income for WIOA eligibility?

A: Any child younger than 19, a "student" younger than 24, a child of any age that is permanently and totally disabled. If staff have person that would meet the definition of a dependent, but are claiming independent status then documentation must be provided to prove independent status (i.e. Tax Returns).

Q: Would a 23-year-old who is not in school, living in the home of his parent, and unemployed be a dependent?

A: While WIOA does not clearly define "dependent", the State chose to follow [IRS guidelines](#) on the subject. In this example, the individual would not be considered a dependent for eligibility determination.

Q: A participant presented two documents to complete Form I-9, each containing a different last name. One document matches the name she entered in Section 1. The participant explained that she had just gotten married and changed her last name, but had not yet changed the name on the other document. Can I accept the document with the different name? (This could also apply to the transgendered community)

A. You may accept a document with a different name than the name entered in Section 1 provided that you resolve the question of whether the document reasonably relates to the employee. You also may wish to attach a brief memo to Form I-9 stating the reason for the name discrepancy, along with any supporting documentation the employee provides. An employee may provide documentation to support their name change, but is not required to do so. If, however, you determine that the document with a different name does not reasonably appear to be genuine and to relate to her, you may ask her to provide other documents from the Lists of Acceptable Documents on Form I-9.

So, in other words if staff truly believe the documents belong to the person presenting them, then they can be accepted with the different names. However, if staff have a reason to doubt the documents then additional documentation will need to be provided.

Q: What is OASDI and is it included in income calculations?

A: OASDI is the official name for Social Security. Social Security benefits based on Age or Disability status are considered “includable” income sources. Supplemental Security Income (SSI) is given only to low-income individuals and is “excludable”.

Please direct all questions or comments regarding the Issuance or this FAQ document to dwdpolicy@dhewd.mo.gov. All active Issuances are available at jobs.mo.gov/dwdissuances. Expired/rescinded Issuances are available on request.

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